Before the
Federal Communications Commission
Washington D.C. 20554

In the Matter of

Application by	)	
Qwest Communications International, Inc.	)	
For Authorization to Provide	)	
In-Region, InterLATA Services	)	WC Docket No. 02-314
In the states of Colorado, Idaho, Iowa	)	
Montana, Nebraska, North Dakota, Utah,	)	
Washington, and Wyoming	)	

DECLARATION OF SHERRY LICHTENBERG

1. I am the same Sherry Lichtenberg who filed declarations and reply declarations in response to the Qwest I and Qwest II section 271 applications. I will not repeat what I explained in those declarations but rather will incorporate them here. The purpose of this declaration is to describe additional information I have learned since I filed my last declaration. My understanding of Qwest's OSS has improved since that time, as WorldCom is now developing its own OSS to place orders in the Qwest region. For now, WorldCom continues to place orders in partnership with Z-Tel through Z-Tel's OSS. But WorldCom intends to migrate to its own OSS platform because that will provide it greater control of the OSS and will be more efficient.

2. In the course of developing its own OSS and through additional commercial experience with Z-Tel in the Qwest region, WorldCom has discovered a number of issues with Qwest's OSS of which we were not previously aware. It is now clear that Qwest's pre-ordering/ordering process is even more complicated than WorldCom previously

understood, that the development process is more difficult, and that deficiencies in Qwest's test environment are even greater.

Qwest's Pre-Ordering and Ordering Processes Are Too Complex

3. I have emphasized the complexity of Qwest's pre-ordering and ordering processes in each of my prior declarations. Without reiterating all of the details, I will briefly repeat that description so that I can add details that WorldCom has recently learned.

4. To begin with, CLECs must perform multiple pre-order transactions before submitting migration orders for UNE-P. I have previously discussed the fact that unlike in other BOC regions, CLECs must submit an address validation inquiry as well as a CSR inquiry before submitting an order. As WorldCom has developed its own OSS, I have learned that CLECs must also submit a separate directory listing inquiry to obtain the information needed to change a customer's directory listing. While the customer's directory address is included on the CSR, other directory information such as the listing type caption, additional listing indicator, record type, and style is provided only through the directory listing inquiry. This information is needed for a directory order. In other BOC regions, this information is included on the CSR.

5. Thus, in the Qwest region, a CLEC needs to submit three pre-order transactions to obtain the information needed for a basic UNE-P migration order with a directory change, while in other regions the CLEC only needs to submit the CSR transaction. Moreover, in other regions, the CLEC can choose to submit an order based on information obtained from the customer without accessing any pre-order functions, while it appears that in the Qwest region, the CLEC must submit the address validation and CSR transactions. Although it is very unreliable to depend on information from the customer – and would be especially

unreliable in the Qwest region where detailed feature information is needed, the CLEC should have the option of submitting an order based on information from the customer. This is particularly important when the BOC's pre-ordering interfaces are down or if the customer refuses to give the CLEC authorization to view his CSR. Although Qwest has told WorldCom that it does not require the CLEC to perform address validation or CSR inquiries, WorldCom has received over 700 rejects on migration and account maintenance orders stating that no pre-order inquiry was performed.

6. More important, however, is that on a routine order, when a CLEC does access Qwest's pre-ordering functions, it must perform three pre-ordering functions to obtain the necessary information. This significantly adds to the time the customer service representative must stay on the phone with the customer at the pre-order stage – which customers resent and CLECs can ill afford in a mass market environment.

7. In addition, the individual pre-order inquiries that CLECs must perform are themselves too complex. The address validation function requires CLECs to type in an address and then often returns multiple addresses to the CLEC, and the CLEC must choose among them in consultation with the customer.

8. The CSR can only be accessed using the customer's address. Moreover, Qwest frequently returns multiple CSRs in response to a CSR inquiry. When Qwest returns multiple CSRs to the CLEC, WorldCom has determined that Qwest does not provide a way for CLECs to program their interfaces to determine which CSR is the most recent. The CLEC can only do so by having the customer service representative look at each CSR and discussing it with the customer. But for the CLEC to display all of the CSRs to its customer service representatives would require significant OSS development and,

because of the large size of CSRs, would waste a substantial amount of storage space in the CLEC's systems. As a result, when Qwest returns multiple CSRs, WorldCom has decide to provide an error message to its customer service representative saying that the CSR is unavailable. WorldCom will therefore be unable to serve the potential customers for whom Qwest returns multiple CSRs, which will cause significant business harm. Not only will WorldCom lose the business of these customers, but other potential customers with whom these customers share their experiences.

9. Even when Qwest returns only a single CSR, it is far too complicated for the CLEC to obtain the needed information from the CSR. As I have explained previously at length, Qwest does not have industry standard migrate as specified ordering which would allow the CLEC to list on its order only the features the customer wishes to obtain from the CLEC. The CLEC must differentiate on an order features the customer already has but wishes to keep from new features the customer wishes to add. The CLEC must include a code of V to recap features that will be migrated to the CLEC and a code of N for entirely new features. The CLEC must therefore determine from the CSR what features the customer already has.

10. This is even more complicated than I previously understood because Qwest's non-standard process applies not only to features but also to feature identifiers ("FIDs"). Almost every feature has multiple FIDs associated with it that provide detailed information about the feature. For example, the call forwarding feature includes a FID that specifies the number that a customer wishes calls forwarded to. If a customer wishes to change the "forward to" number in the Qwest region, the CLEC must list not only the new forward to number, but also the customer's prior forward to number. The CLEC

must also include the code T with the new forward to number and the code of C with the existing number. This greatly increases the complexity of orders and increases the likelihood of rejects. Feature validation issues cause 15.5% of the rejects that WorldCom experiences in the Qwest region.

11. Moreover, Qwest's non-industry-standard migrate as specified process applies not only to migration orders but also to supplemental orders to change a customer's features or FIDs. This is so even if the customer was never a Qwest customer. On a supplemental order, the CLEC must differentiate between the pre-existing features and FIDs and the new features and FIDs, just as the customer must do on initial orders.

12. Once a CLEC has obtained the necessary information at the pre-order stage, the CLEC must place its order. As I have detailed repeatedly before, Qwest's ordering process requires not only that CLECs provide extensive details regarding features but also requires inclusion of a complete service address on every order. Both of these facts continue to lead to a high reject rate in the Qwest region. WorldCom's reject rate remains more than twice as high in the Qwest region as in other regions. In fact, during the weeks of September 27 and October 4, WorldCom's reject rate in the Qwest region was approximately 40%! Address issues are a major reason for this high reject rate. They are responsible for 22.5% of the rejects that WorldCom receives. As noted above, issues related to features cause 15.5% of the rejects WorldCom receives.

13. Qwest indicates that one or two CLECs placing orders via EDI have managed to integrate pre-ordering and ordering and achieved relatively low reject rates. Even if this is so, however, it does not mean that other CLECs can readily do so given the complexities of Qwest's systems. Nor does Qwest say what type of orders these CLECs are placing. In

any event, the harm to CLECs caused by Qwest's systems is not limited to rejects. It includes the time they must spend on the phone with customers and the resources spent in integrating each version of Qwest's complex interfaces. The difficulty and resource intensiveness of integration is further increased because Qwest uses non-standard fields for features and feature details at the pre-order stage that have to be matched to Qwest's ordering fields. No other ILEC does this.

14. Moreover, although Qwest claims to return parsed CSRs, some of the critical information on the CSR is not returned in parsed format. WorldCom has learned during the course of its development efforts that Qwest does not return hunting information, directory-type information, end user name, PIC information, DID information, yellow page heading information or pulsing, signaling or channel information in parsed format. Thus, even if CLECs have somehow managed to integrate some pre-ordering and ordering information for simple orders, it is doubtful they have done so for more complex orders or even for all fields used for simple orders. Additionally, fields for directory listing are parsed, but they differ substantially from industry standards and require extensive development work by the CLECs. Fifteen and one-half percent of the rejects that WorldCom receives in the Qwest region relate to directory listing name or address.

15. Qwest argues that the absence of migration by name and telephone number (or street address and telephone number), which we call migrate by TN for short, and the absence of industry standard migrate as specified can be attributed to CLECs' failure to request these changes until June. But before then there was little order activity in the Qwest region as a result of Qwest's sky-high UNE rates. After those rates finally dropped and WorldCom entered the market and began understanding the complexity of Qwest's

systems, it immediately placed change requests for migrate by TN and migrate as specified. Yet Qwest claims that it cannot implement these changes until at least April 2003 and has not even promised to implement these changes even then.

16. Qwest asserts that some CLECs rejected WorldCom's request to escalate these changes and implement them earlier. But Qwest itself is responsible for this rejection. During the course of the Qwest II proceedings, Qwest indicated in an August 13 *ex parte* letter that WorldCom had not requested escalation of the key change requests. Qwest's comment was important because it suggested that Qwest was amenable to such escalation, which requires a unanimous vote. WorldCom then requested escalation of the requests and implementation of them by the end of 2002. This should have been more than enough time to implement the changes, since both change requests are easy to implement.

17. Qwest responded by stating that it could implement both changes in January 2003 but that it would have to ignore documentation and other change management deadlines in doing so. More important, Qwest said that it could only implement the changes as part of a major release. Qwest added that inclusion of an additional major release on the schedule would force it to sunset release 10.0 in March or April of 2003, earlier than planned. CLECs could not accept an earlier sunset date.

18. Release 10.0 was implemented in June 2002. Release 11.0 is scheduled to be implemented in November of 2002, and Release 12.0 is scheduled for April 7, 2003. Under the change management plan, Qwest can sunset a release 180 calendar days after the subsequent major release has been implemented. Thus, Qwest can sunset release 10.0 on May 18, 2003, 180 days after implementation of Release 11.0. Because many CLECs have developed to Qwest's interface release 10.0 and are not yet ready to move off of it,

there is already a change request pending to delay the sunset of 10.0 past May. But Qwest has said that it would have to sunset release 10.0 earlier not later if an additional major release were added to the schedule.

19. Qwest could have avoided this problem by agreeing to implement migrate as specified and migrate by TN as part of release 11.0 rather than in a separate release. Qwest also could have implemented these changes as part of a maintenance release or dot release in which case they would have been added to interface versions that were already deployed. After all, migrate by TN should simply require Qwest to lift some edits on address in its back-end systems. Similarly, migrate as specified should be easy to implement, especially since Qwest already had industry standard migrate as specified in place before unilaterally replacing it with today's non-standard version.

20. Other BOCs, including BellSouth and Ameritech, implemented migrate by TN as part of maintenance releases. (They always had in place industry standard migrate as specified.) If Qwest had agreed to implement these changes as part of a maintenance release, CLECs would not have been faced with an impossible choice between the continued availability of release 10.0 and a 2002/January 2003 implementation of migrate by TN and migrate as specified.

21. Alternatively, Qwest could have designated the release of migrate by TN and migrate as specified a major release, implemented this release in January, but nonetheless avoided early sunset of release 10.0. It was Qwest that decided that implementation of a major release in January would result in the early sunset of release 10.0. Thus, as a result of Qwest's actions, some CLECs had little choice but to vote against WorldCom's escalation request. Qwest also voted against WorldCom's escalation request, preventing

the required unanimous vote in any event. Nonetheless, it is important to note that a majority of CLECs voted in favor of the request. But Qwest prevented WorldCom from obtaining the unanimous vote that was necessary.

22. Qwest's pre-ordering and ordering processes therefore remain far too complex and there is no prospect of imminent relief. Even if Qwest finally implements some of the needed changes in April, that is far too long for CLECs to wait for very basic changes that should be standard in any OSS. WorldCom plans to launch its own OSS well before April and would like to dramatically increase its ordering volume when it does. This is going to be extremely difficult, however, given the poor quality of the OSS that is in place today.

23. Additionally, there is no guarantee that the needed changes will be made in April. The scope of the changes is also somewhat uncertain. And even when they are made, these changes will not eliminate all of the problems associated with Qwest's complex pre-ordering/ordering processes. But what is clear at a minimum is that the migrate by TN and migrate as specified processes must be implemented before Qwest obtains long distance authorization.

Qwest's Process for Supplemental Orders Remains Deficient

24. I have described previously the importance of an efficient process for placing supplemental orders for account maintenance. Customers often want to place these supplemental orders soon after placing their initial order because they change their mind about the features they want. And once the customer has migrated to the CLEC, the CLEC should be able to place such orders based entirely on the information in its own systems. Forcing the CLEC again to access Qwest's systems to obtain information on a CLEC customer imports the difficulties of Qwest's pre-ordering/ordering process into

account maintenance orders. Yet Qwest prevents CLECs from submitting account maintenance orders based solely on the information in their own systems.

25. Indeed, until Qwest updates a customer's CSR to reflect that the CLEC owns the account, the CLEC essentially cannot place an account maintenance order at all. If the CLEC places such an order, Qwest will reject the order unless the CLEC puts a special indicator on the order to tell Qwest to process the order manually and a note including the PON on the original order. While this may work for CLECs that place orders through the GUI, it will not work for CLECs placing orders through EDI. The CLEC would have to modify its systems to allow input of the special indicator and devise a means of including the needed note on the orders. Before placing an order, it would then have to determine from the CSR whether the CSR has been updated or whether the special indicator should be included. Moreover, if the special indicator was included, the order would then be processed manually with all of the difficulties that attend manual processing. Thus, a CLEC using EDI cannot rely on Qwest's manual work-around solution to place orders before Qwest has updated the CSR.

26. Unfortunately, however, Qwest does not update the CSR for days. Recently, Qwest has provided three different answers on how long it takes Qwest to update the CSR. But it appears the answer is around 5 days. Other BOCs update the CSR within 24 hours of completing an order unless an error occurs. Qwest's failure to do the same substantially harms CLECs, because the account maintenance orders they submit in the interim will be rejected.

27. The difficulty in placing an account maintenance order in the Qwest region is further increased by Qwest's requirement that CLECs access the CSR before placing an account

maintenance order -- even if the account maintenance order is placed months after the initial order. I have previously discussed the need to place a customer code on each order, and the fact that the customer code changes after the customer migrates to the CLEC. This discussion was based on information Qwest provided to Z-Tel to explain rejects Z-Tel was receiving on account maintenance orders. But Qwest has now told WorldCom there is no need to place customer codes on the order and no need to access the CSR before placing account maintenance orders. Qwest's documentation also states that the CUSCODE field is optional for UNE-P orders.

28. Nonetheless, Z-Tel continues to receive rejects on account maintenance orders stating that "no CSR is found." Indeed, there has been a recent increase in rejections of this type such that they are the number one cause of rejects on WorldCom/Z-Tel orders. In response to WorldCom inquiries, Qwest has again explained that the reason for these rejects is that WorldCom is including the customer code that was on the CSR when the customer was a Qwest customer, rather than the new customer code. Thus, it appears that Qwest does require the CLEC to include the customer code and that the customer code changes after the customer migrates to the CLEC. If so, this is a major problem. If not, the conflicting information WorldCom has received on this topic exemplifies the difficulties WorldCom has had in dealing with Qwest.[1]

Qwest Makes OSS Development Extremely Difficult for CLECs

[1] Qwest's documentation on customer codes is itself extremely confusing in general. At one point, WorldCom asked about the relationship between the "CUSTCODE" and "REFNUM" fields and was told they were different. Yet when WorldCom asked where the CUSTCODE was returned on the CSR, it was told that the CUSTCODE was returned in the REFNUM field.

29. As I have discussed above, WorldCom's development in the Qwest region has been substantially complicated by the complex nature of Qwest's pre-ordering and ordering interfaces. It has been further complicated by Qwest's poor documentation.

30. WorldCom's Information Technology Group has found that Qwest's documentation is so poor that it has compared it to Verizon's documentation in 1998. There are a multitude of inconsistencies in that documentation, as well as substantial information that is missing altogether. For numerous EDI fields that are conditional fields, Qwest provide rules stating that the field must be filled in under certain circumstances, but does not state whether it is otherwise optional or prohibited to fill in the field. For example, the Developer Worksheet CSRQ68 QNR and Preparation Guide 34e both say that a particular field must be filled in if the service indicator is C or D, but do not say whether the field is otherwise optional or prohibited. The same is true for Preparation Guide 4.7g and Developer Worksheet CSRR 19a ACCTDESC. With respect to other fields, Qwest provides inconsistent information. For example, Preparation Guide 4.36b lists the field PATHNAME, but there is no corresponding field in the Developer Worksheet at all. The same is true for Preparation Guide 4.36c CSRRI and Preparation Guide 4.36d D/TFILECRE. Other fields are described in all documentation but described inconsistently. CSRR105 SASF states that the field is a 4 character field, while the Developer Worksheet CSRR41 states that it is a five character field. Preparation Guide 4.24a identifies a field as associated with the listed address, yet the Developer Worksheet CSRR63 Floor states that it is associated with the billing address. The same is true for Preparation Guide 4.24b and Developer Worksheet CSRR64 ROOM/Mail Stop. And these are only examples of hundreds of issues that WorldCom has found with Qwest's

documentation. In many instances, even after WorldCom has asked Qwest for this information, Qwest has been unable to provide it. Many of the documentation issues that WorldCom has raised with Qwest have been open since August. This is astounding with respect to documentation that ostensibly should be used by CLECs to construct their interfaces..

31. Another example of Qwest's poor documentation exists in Idaho. In the Northern part of Idaho, different Universal Service Ordering Codes are required for ordering than are used in the Southern part of the state. But Qwest has not delineated what the border is between the Northern and Southern parts. When WorldCom asked this question, Qwest pointed to the state tariffs. But the Southern Idaho tariff site does not delineate what switches fall within that region. The Northern Idaho site does list the exchange areas in the region by community name but does not list the CLLI codes that would show WorldCom what switches fall within the region. Thus, WorldCom does not know what USOCs should be used for ordering in Idaho.

32. The absence of business rule documentation has led to substantial problems for WorldCom in attempting to code its interfaces. WorldCom must code in significant part by trial and error. WorldCom is submitting test orders in SATE and using the results to determine its coding. This wastes resources and is often inaccurate. It will also almost certainly result in rejects in production and the need to recode interfaces when the proper business rules are finally provided.

Qwest Transmits "Jeopardies for Reject Reasons" After FOCs

33. I have previously explained that Qwest transmits jeopardies after FOCs that should really be transmitted as rejects before FOCs. Indeed, I have learned that that Qwest calls these

"jeopardies for reject reasons." These jeopardies require the CLEC to submit supplemental orders to correct information in a customer's address or end user name, for example. Whether these notifications are called jeopardies or rejects, Qwest should not be transmitting to CLECs any order status notices that require the CLEC to submit supplemental orders after Qwest has transmitted FOCs. I will not repeat my earlier explanation of why this is so. But one additional reason has become clear.

34. Qwest has told WorldCom that after it transmits a FOC, it creates a service order in its back-end system. If Qwest later transmits a jeopardy to the CLEC, it does not immediately cancel the service order. Instead, the CLEC has 4 hours to submit a supplemental order and Qwest will then allow the order to complete. But 4 hours is very little time to submit a supplemental order. Most of the time the CLEC will not submit the supplemental order until after 4 hours. By then, Qwest's process calls for it to have cancelled the service order in its back-end system.

35. Qwest's process for canceling the service order is wholly manual, however. Like all manual processes, it can result in errors, and the service order will not be cancelled. The service order may remain hung up in Qwest's systems. If so, it may cause complications when the CLEC does submit a supplemental order. Alternatively, the service order may complete even though Qwest has previously transmitted a jeopardy. If it does and if Qwest provides a completion notice, the CLEC will be extremely confused and will not know if the customer is its customer. The situation will be even worse if Qwest does not transmit a completion notice and the CLEC has no idea that the customer has become its customer.

36. I also want to point out that Qwest's return of some rejects as jeopardies distorts the metrics concerning timeliness of reject notices. (PO-3) The point of this metric is to ensure that CLECs quickly receive reject notices that enable them to supplement orders and have the orders processed in a timely fashion. But the results will not be accurate if the rejects that are the most delayed are left out of the metric because Qwest has decided to call them jeopardies.

Qwest Returns Completion Notices Even When Orders Have Not Been Completed

37. In my prior declarations, I discussed the fact that Qwest returns completion notices on DSL orders even when the orders have not completed. Qwest has now confirmed that this is true not just for DSL orders but also for UNE-P orders. Qwest auto-completes the orders at the end of each day and sends a completion notice regardless of whether the order actually has been provisioned. Thus, the CLEC will almost always receive a completion notice on the date the order is due to be completed, but this does not mean that the order actually has been provisioned.

38. As a result, the completion notice is essentially worthless to the CLEC. It tells the CLEC only what it already knew – the due date on the order has arrived.

39. The work that goes into formulating precise performance measures regarding return of completion notices is also worthless. There is no doubt that Qwest will meet the performance measure for return of completion notices if it always sends a completion notice on the due date regardless of whether the order actually has been completed.

40. Qwest must rapidly fix its process for returning completion notices. It is vital that CLECs know if their orders have been completed. CLECs need to know when they are responsible for a customer's maintenance requests and when they should begin billing a

customer. If the CLEC relies on a completion notices that wrongly reports that an order has been completed, it will begin billing the customer who will also continue to receive bills from Qwest. In addition, it will respond to maintenance requests from the customer but will receive the confusing response from Qwest that the customer is not its customer. This is unacceptable.

Qwest's Test Environment Does Not Mirror Production

41. Qwest's test environment SATE does not mirror production as I have explained before. But the differences between SATE and production are even greater than I thought. And SATE is deficient in other respects as well.

42. As WorldCom has developed its OSS for production, it has placed test transactions in SATE to test its interfaces. But WorldCom has been unable to place pre-order inquiries for directory listings because the directory listing inquiry does not exist in SATE.[2] The entire pre-order function is simply missing. The result is that WorldCom cannot determine whether the pre-order inquiries it has developed for directory listing will work in production. It cannot determine whether there are problems either on its side of the interface or on Qwest's side with respect to this pre-ordering function.

43. WorldCom also has been unable to test ordering functionality related to directory listings. WorldCom cannot place test orders for directory listing without obtaining pre-order information on directory listing first. But there is no way to obtain the pre-order information.

44. WorldCom requested that Qwest add a directory listing inquiry to SATE. Qwest responded by stating that it intends to add this functionality in subsequent versions of

[2] As noted above, the directory address is included on the CSR but other directory information such as the listing type caption, additional listing indicator, record type, and style is provided only through the directory listing inquiry.

SATE. But Qwest has refused to add the directory listing inquiry to the current version of SATE, the version used to test the OSS version to which WorldCom is currently building. Qwest has thus refused to make SATE even remotely adequate for current testing.

45. SATE is deficient in other way as well. The test scenarios Qwest provides for SATE include only the most basic order types. In SATE, CLECs are only able to retrieve full CSRs for single line customers, for example. The test scenarios for pre-order CSR inquiries do not include any multi-line accounts. They also do not include any scenarios in which the customer's directory listing address (the piece of directory listing information that is included on the CSR) differs from the customer's service address, a very common scenario. In fact, of the 15 pre-order test scenarios WorldCom typically uses to test CSRs and directory listings, only one is included as a SATE test scenario.

46. WorldCom requested that Qwest add the missing scenarios to SATE. Qwest agreed to add the scenarios for WorldCom's use in SATE version 10.0. For future versions of SATE, WorldCom will again have to make special requests for addition of the scenarios, and it can take weeks for Qwest to add scenarios to SATE. And even for version 10.0, Qwest was unwilling to make the scenarios available to all CLECs without a request from multiple CLECs. Thus, as far as WorldCom knows, WorldCom is the only CLEC able to test these scenarios. Even more important, the absence of these scenarios in SATE means that Qwest is not using these scenarios in its internal testing. Without doing so, Qwest's internal testing cannot be remotely adequate, because it is limited to simple orders. Based on Qwest's documentation, for example, there are many issues concerning the way

in which Qwest returns information on multi-line accounts. But Qwest's performance for such accounts was not tested.

47. The fact is that Qwest's test environment, like its OSS generally, is far behind the rest of the industry and far from sufficient to warrant section 271 approval. Qwest must improve SATE and simplify its OSS before it is allowed to enter the long distance market.

CONCLUSION

48. This concludes my declaration on behalf of WorldCom.

I declare under penalty of perjury that the foregoing is true and correct.

_____/s/_____

Executed on: October 15, 2002